IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOSHUA SANTIAGO, individually and)	Case No. 23 CV 2891
on behalf of others similarly situated,)	
)	Hon. Georgia N. Alexakis
Plaintiff,)	
)	Magistrate Hon. Beth W. Jantz
v.)	
)	
TESLA, INC., a Delaware corporation,)	
)	
Defendant		

JOINT STATUS REPORT

Plaintiff Joshua Santiago and Defendant Tesla, Inc. ("Tesla") (together, the "Parties"), through their respective counsel, hereby submit this Joint Status Report pursuant to Honorable Beth W. Jantz's November 19, 2025 Minute Order (ECF No. 67). For their Joint Status Report, the Parties state as follows:

1. Progress of Discovery

The Parties exchanged Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) on August 8, 2025.

Tesla served its First Set of Interrogatories and First Set of Requests for Production to Plaintiff Santiago on August 8, 2025. Plaintiff Santiago served his First Set of Interrogatories and First Set of Document Requests to Tesla on September 8, 2025.

After the Parties agreed to reciprocal extensions for their written discovery response deadlines, Plaintiff Santiago timely responded to Tesla's First Set of Interrogatories and First Set of Requests for Production on October 29, 2025. Tesla's responses to Plaintiff Santiago's First Set of Interrogatories and First Set of Document Requests are due on November 28, 2025.

The Parties are drafting and negotiating a protective order and ESI protocol and after finalizing such agreements will begin rolling productions of responsive documents.

The Parties will continue to meet and confer as necessary as to any disputes concerning discovery responses and/or document productions.

2. <u>Settlement Interest</u>

While the Parties remain open to discussions concerning a potential resolution of this matter, they agree that such discussions are premature at this stage.

3. Other Pertinent Issues

The Parties do not believe that there are any other pertinent issues that need to be addressed at this time.

Dated: November 24, 2025

/s/ Eugene Y. Turin

Eugene Y. Turin

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